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VIA ECF

November 5, 2024

Honorable James R. Cho
United States Magistrate District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

We represent Plaintiffs in the above-referenced matter. Pursuant to the Court's Minute Entry for the Initial Conference proceedings held on August 5, 2024 (the "Order"), we write on behalf of the parties, with the consent from Defendants, to provide a joint status report in the above-referenced action.

On September 9, 2024, and pursuant to the Order, Plaintiffs served their Rule 26 Initial Disclosures on Defendants. That same day, Defendants moved for a two-day extension to serve their automatic disclosures (ECF No. 45), which the Court granted. On September 11, 2024, Defendants served their Rule 26 Initial Disclosures on Plaintiffs.

On October 7, 2024, Plaintiffs' counsel sent Defendants' counsel via email a draft proposed confidentiality order, pursuant to Your Honor's Individual Practices, Rule E. On November 5, 2024, Defendants' counsel provided Plaintiffs' counsel with comments on the draft proposed confidentiality order. The parties plan to meet and confer to discuss the terms of the proposed confidentiality order.

On October 28, 2024, Plaintiffs served their First Request for Production of Documents (the "Requests") on Defendants.

The parties do not request a referral to the Court-annexed mediation program or a settlement conference at this time.

Hon. James R. Cho
November 5, 2024
Page 2 of 2

The parties thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Robert A. Mantel
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